

**REMARKS**

Reconsideration of the present application is respectfully requested. Claims 1-26 previously presented for examination remain in the application. Claims 1, 18, and 23 claims have been amended. No claims have been canceled or added.

Claims 1-26 stand rejected under 35 U.S.C. § 102(a) as being considered to be anticipated by U.S. Patent No. 6,792,585 to Ku et al. ("Ku").

For a 35 U.S.C. §102 reference to anticipate a claim, the reference must teach every element of the claim. Section 2131 of the MPEP recites: "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

With respect to independent claim 1, Applicants teach and claim: "A method comprising: representing each vector associated with an integrated circuit datapath design as one of a row and a column in a graphical interface; and representing each bit slice associated with the integrated circuit datapath design in an orthogonal manner to the vectors in the graphical interface, the corresponding vector and bit slice representation in the graphical interface being different than an associated physical layout." The graphical interface enables a user to view and/or manipulate the layout of an integrated circuit. See, for example, specification at paragraph [0013].

Ku discloses a placement engine which uses pseudo nets and pseudo pins in the placement engine calculations. (See Summary, Col. 3 lines 54-56 and 60-67, Col. 4, lines 1-5, 25-63) Ku discloses only how the placement engine operates to automatically place cell instances. See for example, Figures 1 and 5 of Ku, which illustrate the operation of the placement engine. (Col 2, lines 45-60; Col 5, lines 7-17) While Ku refers to pictorial representations illustrating relative structures in a datapath (Fig. 2), Ku does not indicate that these structures are represented to a user using a graphical interface (Col 2, lines 60-67, Col. 3, lines 1-45). Ku also refers to pictorial representations illustrating structure bonding of cell instances (Fig. 3) and cell instances constructed with pseudo net and pseudo pins (Fig. 4). However, Ku does not indicate that these structures are represented to a user using a graphical interface (Col. 3, line 46 – Col. 5, line 6).

Thus, Ku does not teach or disclose "a graphical interface" as required by claim 1. Each of the other pending independent claims 7, 18, and 23 recites limitations that are similar to the limitations of claim 1, although some differences may exist among the limitations of the other pending independent claims. These similar limitations nevertheless patentably distinguish claims 7, 18 and 23 over Ku. Therefore, for at least these reasons, Applicants respectfully submit that Ku does not anticipate all elements of Independent claims 1, 7, 18, and 23.

Claims 2-6 are dependent on independent claim 1. Claims 8-17 are dependent on independent claim 7. Claims 19-22 are dependent on independent claim 18. Claims 24-26 are dependent on independent claim 23. Thus, for at least the same reasons advanced above with respect to independent claims 1, 7,

18, and 23, Applicants respectfully submit that Ku does not anticipate all elements of dependent claims 2-6, 8-17, 19-22, and 24-26.

Based on the foregoing, applicants respectfully submit that the applicable rejections have been overcome and that claims 1-26 are in condition for allowance. If the Examiner disagrees or believes that further discussion will expedite prosecution of this case, the examiner is invited to telephone applicants' representative at the number indicated below.

If there are any charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

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CERTIFICATE OF TRANSMISSION

(37 C.F.R. § 1.8(a))

I hereby certify that this correspondence is being transmitted by facsimile to the United States Patent and Trademark Office on June 20, 2006.

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